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### REMARKS

Claims 1, 4-7, 9-19, and 21-37 are all the claims presently pending in the application.

While Applicants believe that all of the claims are patentable over the cited references, to speed prosecution, claims 3 and 8 have been incorporated into claim 1, and claim 20 has been incorporated into claim 19, to define more clearly and particularly the features of the invention.

Claims 3, 8, and 20 correspondingly are canceled without prejudice or disclaimer.

Claims 6, 14, 17-20, and 33-35 also have been amended to define more clearly and particularly the features of the invention.

Claims 4, 5, 7, 9, and 10 also correspondingly have been amended to change their dependency from claims 3 and 8 to claim 1, respectively.

Also, while Applicants believe that claim 17 is patentable over the cited references, to speed prosecution, claim 17 has been amended in accordance with the Examiner's suggestions to define more clearly and particularly the features of the invention.

Claims 26-32, 36, and 37 are withdrawn from consideration as being directed to non-elected species of the invention.

While Applicants believe that all of the claims are clear and definite, to speed prosecution, the claims have been amended to define more clearly the features of the claims invention, thereby overcoming the rejection under 35 U.S.C. § 112, second paragraph, set forth below.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no

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amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1, 3-16, 22, 25, and 33-35 stand rejected under 35 U.S.C. § 112, second paragraph.

Claims 1, 8-13, and 16-18 stand rejected under 35 U.S.C. § 101.

Claims 1, 3-8, 14-17, 19-25, 33, and 34 stand rejected under U.S.C. § 102(e) as being anticipated by Taylor (U.S. Patent No. 6,209,004).

Claims 17 and 19-25 stand rejected under U.S.C. § 102(b) as being anticipated by Boyce et al., Special Edition Using Microsoft Office 97, pages 185-199 and 1017-1031, © 1997 (hereinafter "Boyce").

Claims 9-13, 18, and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Taylor in view of Fong et al. (U.S. Patent No. 6,279,015)

These rejections are respectfully traversed in the following discussion.

## **I. THE CLAIMED INVENTION**

The claimed invention is directed to a method of reconciling component variables with container variables in a document.

In conventional document assembly systems, importation of document components is typically based on fixed criteria which presents problems for complex documents. For example, a particular clause may be reused throughout a document, and it may be integrated within a larger assembly of document components which is referred to as a "container" or "container assembly". There must be links between the container assembly and the document component

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being imported during document assembly, and both items may contain variables which may refer to the same domain concepts (e.g., see specification at page 3, line 20 to page 4, line 5).

However, maintaining consistency between these variables once the document component (source component) has been imported presents problems unless these variables representing the same concepts are somehow linked to one another. Hitherto the present invention, such a solution has not been provided and hence these problems have been prevalent (e.g., see specification at page 4, lines 6-10).

Instead, with the conventional systems and methods, there are simply container variables and components (e.g., see specification at page 5, lines 9-10).

In conventional systems, the component (independent of its content) that structures the variables together is not independent of the value assignment. As a result, no manual linking of these concepts is provided, and thus there is minimal (if any) flexibility and/or reusability of the components since the components are not generally applicable or generic (e.g., see specification at page 6, lines 1-5).

Further, there may be several different components in the document that all refer to the same concepts (e.g., the company's address is repeated in different places throughout the document). However, since in conventional systems the variables in the different components are not linked, if the company's address is changed in one location, it will not be updated elsewhere. This is a serious maintenance problem that would be fatal to a system that relies heavily on component-based drafting (e.g., see specification at page 6, lines 6-12).

In the claimed invention, on the other hand, there are three concepts which are considered, including the position in the document where the component goes, the component itself that plugs in and out of the position in the document, and the particular domain model

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information which plugs into the component. The novel and unobvious reconciler of the claimed invention allows a manual linking of these concepts, thereby allowing greater flexibility and greater reusability of the components because the components are more generally applicable (e.g., see specification at page 9, lines 11-18).

Thus, with the unique and unobvious features of the claimed invention, the user can reduce its database requirements, increase flexibility and reusability in that, for any given document component, the document component can be applied more generically to increase its reusability (e.g., more generically reusable). The user also can determine the linkages and leverage loose coupling of the domain knowledge and document knowledge. Further, the invention allows reconciliation to be performed interactively by the user (e.g., see specification at page 9, line 19, to page 10, line 3).

## II. THE 35 U.S.C. §112 REJECTIONS

A. Claims 1, 3-16, 22, 25, and 33-35 stand rejected under 35 U.S.C. § 112, second paragraph.

Applicants appreciate the Examiner's helpful suggestions for amending the claims.

Applicants have amended some of the claims in accordance with the Examiner's suggestions.

However, Applicants have not amended the claims in instances which are not deemed germane to the ordinarily skilled artisan's understanding of the claims.

Applicants submit that the claims clearly and particularly define the features of the invention, and thus, the claims would be understandable to the ordinarily skilled artisan.

For example, Applicants believe that claim 1 would be understandable to the ordinarily skilled artisan as written, and that such proposed amendments are not

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necessary to the ordinarily skilled artisan's understanding of these features. Indeed, claim 17 recites similar language (e.g., "associating") as that which is proposed by the Examiner.

Thus, while Applicants believe that claim 17 is patentable over the cited references, to speed prosecution, claim 17 has been amended in accordance with the Examiner's suggestions (which are directed to the claimed "associating") to define more clearly and particularly the features of the invention.

Therefore, the Examiner respectfully is requested to withdraw this rejection.

### III. REJECTION UNDER 35 U.S.C. § 101

Claims 1, 8-13, and 16-18 stand rejected under 35 U.S.C. § 101. Independent claims 1, 17, and 18 have been amended as suggested by the Examiner. Therefore, this rejection should be withdrawn.

### IV. THE PRIOR ART REJECTIONS

A. Claims 1, 3-8, 14-17, 19-25, 33, and 34 stand rejected under U.S.C. § 102(e) as being anticipated by Taylor. Claims 17 and 19-25 stand rejected under U.S.C. § 102(b) as being anticipated by Boyce. Claims 9-13, 18, and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Taylor in view of Fong.

Applicants respectfully traverse these rejections, for at least the following reasons.

While Applicants believe that the claims are patentable over the cited references, to speed prosecution, Applicants submit that the independent claim 1 has been amended to include the

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features of claims 3 and 8, thereby defining more clearly and particularly the features of the claimed invention.

Applicants respectfully submit that Taylor, Boyce, and Fong, either individually or in combination, clearly do not disclose or suggest all of the features of the novel and unobvious combination of elements recited in the claims. Indeed, claims 3 and 8 (which have now been incorporated into claim 1, have not been rejected based on Boyce and Fong.

For example, independent claim 1 recites, *inter alia*, a computer implemented method of reconciling component variables with container variables in a document, including:

*identifying a component variable in a component;*  
*determining if there is a container variable in a container*  
*that refers to a same domain concept;*  
*if the container variable is determined to refer to the same*  
*domain concept, associating said component variable in the*  
*component with said container variable in the container;*  
*identifying a link expression of said component variable;*  
*and*  
*determining whether the link expression can be identified*  
*with an element in a domain model of the document,*  
*wherein said determining whether the link*  
*expression can be identified with said element in said domain*  
*model of the document uses an automatic reconciliation algorithm*  
*to find a best identity match, and*  
*wherein said identifying said link expression of said*  
*component variable is performed interactively by a user (emphasis*  
*added).*

Thus, according to the claimed invention, three concepts can be considered, including the position in the document where the component goes, the component itself that plugs in and out of the position in the document, and the particular domain model information which plugs into the component. The novel and unobvious reconciler of the claimed invention allows a manual linking of these concepts, thereby allowing greater flexibility and greater reusability of the

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components because the components are more generally applicable (e.g., see specification at page 9, lines 11-18).

Thus, with the unique and unobvious features of the claimed invention, the user can reduce its database requirements, increase flexibility and reusability in that, for any given document component, the document component can be applied more generically to increase its reusability (e.g., more generically reusable). The user also can determine the linkages and leverage loose coupling of the domain knowledge and document knowledge. Further, the invention allows reconciliation to be performed interactively by the user (e.g., see specification at page 9, line 19, to page 10, line 3).

The Examiner alleges that Taylor discloses that identifying the link expression of the component variable is performed interactively by a user in that the document creation system allows the user to edit the document that is created by combining the database data with the corresponding templates (e.g., see Office Action at page

However, Applicants respectfully submit that merely "editing the document" clearly is not the same as, or comparable to, the claimed feature of "*determining whether the link expression can be identified with an element in a domain model of the document*", as recited in claim 1.

Moreover, Taylor does not disclose or suggest using "an automatic reconciliation algorithm to find a best identity match", as alleged by the Examiner. Indeed, Taylor does not mention automatically reconciling.

Further, assuming *arguendo* that Taylor discloses the step of "*determining*" above, Taylor does not disclose or suggest that "*said identifying said link expression of*

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*said component variable is performed interactively by a user*", as recited in independent claim 1.

Applicants also note that the Examiner has characterized the recitations of claim 1 in accordance with the Examiner's suggested amendments, which correspond to the language of claim 17, as mentioned above. However, as set forth above, Applicants believe that claim 1 would be understandable to the ordinarily skilled artisan and that such proposed amendments are not necessary to the ordinarily skilled artisan's understanding of these features.

Thus, while Applicants believe that claim 17 is patentable over the cited references, to speed prosecution, claim 17 has been amended in accordance with the Examiner's suggestions (which are directed to the claimed "associating") to define more clearly and particularly the features of the invention.

With respect to independent claim 17, Applicants respectfully submit that Boyce neither discloses nor suggests "*automatically*" reconciling component variables with container variables in a document, as claimed and described in the specification.

Applicants respectfully submit that the Examiner unreasonably interprets the merging of data from the Access database table into the corresponding merge fields once the process begins as being comparable to the claimed feature of "*automatically reconciling*", as recited in claim 17.

With respect to claim 19, Applicants respectfully submit that Boyce neither discloses nor suggests "a reconciler that maps container variables in said container, with component variables in said component", as claimed.



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The Examiner alleges that the Boyce reference discloses that each "merge field" in the Word document is "mapped" to corresponding fields of each record in the Access data base. However, Boyce does not disclose or suggest such a feature.

Thus, Applicants respectfully submit that Boyce does not disclose or suggest all of the recitations of claim 19, and therefore, the rejection of this claim should be withdrawn.

Independent claims 33, 34, and 35 are patentable over Boyce for somewhat similar reasons as those set forth above with respect to claim 1. Claim 35 also is patentable over Boyce for somewhat similar reasons as independent claim 18.

Also, with respect to claim 33, the Examiner alleges that Boyce discloses "*the same "means" for reconciling component variables with container variable in that the method is performed by merging components of the Access database with the Word document*" (see Office Action at page 24).

However, the Office Action has not identified any structure, equivalents thereof, or identity of function necessary for at least the claimed "means, if an identification is determined, for associating said component variable in said component with said container variable in the container" as claimed and described in the specification.

In view of the foregoing, Applicants respectfully submit that Taylor, Boyce, and Fong, either individually or in combination, clearly do not disclose or suggest all of the features of the novel and unobvious combination of elements recited in the claims.

Therefore, the Examiner respectfully is requested to withdraw the rejection of these claims.

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#### IV. REQUEST FOR REJOINDER OF NON-ELECTED CLAIMS

Applicants respectfully request that the Examiner rejoin non-elected claims 26-32, 36, and 37, which were withdrawn from consideration as being directed to non-elected species of the invention, and permit these claims to pass to allowance for somewhat similar reasons as those set forth above.

#### V. FORMALITIES

##### A. Objections to Specification

The Office Action objects to the specification as allegedly not providing antecedent basis for some of the features of claims 1, 3, 22, and 25.

Applicants submit that the features identified by the Examiner clearly are recited in the "original" claims, and thus are deemed to be part of the original disclosure. Thus, to obviate this objection, Applicants incorporate the features recited in the original claims into the "Summary of the Invention" section of the specification.

While Applicants appreciate the Examiner's helpful suggestions for amending the text of the specification, Applicants respectfully submit that such amendments are not deemed germane to the ordinarily skilled artisan's understanding of the claims, and thus, are not necessary.

Accordingly, the Examiner is requested to withdraw these objections.

##### B. Objections to Drawings

The Office Action also maintains the objection to claim 18, lines 3-4. Applicants reiterate that the claimed features are illustrated, for example, in Figures 3-5 of the present

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invention (e.g., see connector 14, for example, in Figure 3 and 5, and the corresponding disclosure).

Thus, Applicants respectfully request that the Examiner withdraw this objection.

### C. Objections to Claims

The Examiner raises numerous objections to the language of the claims (e.g., see Office Action at pages 4-6). Applicants' respectfully submit that the claims have been amended to obviate these objections.

While Applicants appreciate the Examiner's helpful suggestions, with respect to claims 24 and 25, however, Applicants respectfully submit that the claims do not merely recite "reconciling", but instead, recite additional limitations which clearly further limit the scope of claim 19, from which they depend. That is, all of the language of the claims should be considered in determining whether claims 24 and 25 further limit claim 19.

Thus, no amendments are deemed germane to the ordinarily skilled artisan's understanding of the claims.

Applicants also note that, "mapping" and "reconciling" clearly are not treated as being synonymous in the specification. These terms should be construed in light of the specification and their ordinary meanings.

Accordingly, the Examiner is requested to withdraw the claim objections.

## VI. CONCLUSION

In view of the foregoing, Applicant submits that claims 1, 4-7, 9-19, and 21-37, all the claims presently pending in the application, are patentably distinct over the prior art of record

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and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: July 7, 2005

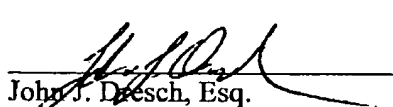
  
John J. Dresch  
Registration No. 46,672

Sean M. McGinn  
Registration No. 34,386

**McGinn & Gibb, PLLC**  
8321 Old Courthouse Road, Suite 200  
Vienna, VA 22182-3817  
(703) 761-4100  
Customer No. 21254

**CERTIFICATE OF TRANSMISSION**

I certify that I transmitted via facsimile to (703) 872-9306 the enclosed Amendment under 37 C.F.R. § 1.111 to Examiner William D. Hutton, Jr. on July 7, 2005.

  
John J. Dresch, Esq.  
Registration No. 46,672

Sean M. McGinn, Esq.  
Registration No. 34,386